

GIBSON DUNN

Mylan Denerstein
Partner
T: +1 212.351.3850
F: +1 212.351.6350
MDenerstein@gibsondunn.com

February 20, 2025

VIA CM/ECF

The Honorable Jesse M. Furman
U.S. District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: Andav Capital and Nisha Desai v. PayPal Holdings, Inc. and PayPal Ventures,
No. 1:25-cv-00033

Dear Judge Furman:

I write on behalf of Defendants PayPal Holdings, Inc. and PayPal Ventures to request an extension of Defendants' deadlines to respond to Plaintiffs Andav Capital and Nisha Desai's Complaint. *See* Dkt. 1.

Plaintiffs filed the Complaint on January 2, 2025. *See* Dkt. 1. Defendants agreed to waive service of the Complaint, and Defendants are due to respond to the Complaint by March 17, 2025. *See* Dkts. 16, 17. Defendants recently retained the undersigned as counsel for this matter. To provide adequate time to respond to the Complaint, Defendants respectfully request that the Court extend the March 17 deadline to respond to the Complaint by 30 days (until April 16, 2025).

Defendants have not previously requested any extension of this filing deadline, and Plaintiffs do not oppose the requested extension. The parties are next scheduled to appear before the Court for an initial conference on May 6, 2025, and are due to file a proposed Civil Case Management Plan and Scheduling Order and joint letter addressing topics related to the initial conference by May 1, 2025. *See* Dkt. 23.

GIBSON DUNN

The Honorable Jesse M. Furman
U.S. District Court for the Southern District of New York

February 20, 2025
Page 2

Respectfully submitted,

/s/ Mylan L. Denerstein

Mylan L. Denerstein
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, NY 10166-0193
(212) 351-3850
mdenerstein@gibsondunn.com

Jason C. Schwartz (*pro hac vice forthcoming*)
GIBSON, DUNN & CRUTCHER LLP
1700 M Street N.W.
Washington, D.C. 20036-4504
(202) 955-8242
jschwartz@gibsondunn.com

Gregg J. Costa (*pro hac vice forthcoming*)
GIBSON, DUNN & CRUTCHER LLP
811 Main Street, Suite 300
Houston, TX 77002-6117
(346) 718-6649
gcosta@gibsondunn.com

cc: All Counsel of Record (via CM/ECF)